

**Amendments to the Drawings**

The amendment to Fig. 5G5 replaces "Send " with "Send" in the element having reference number 595, thereby aligning this syntax of the sample output file 580 to its corresponding syntax in the "VALUE" attribute at reference number 563 of the sample input file 560 in Fig. 5E.

Fig. 6C2 is amended to add missing reference numbers 681 and 682. (These reference numbers are used on p. 27, line 10 of the specification.)

In Fig. 12, the text in Blocks 1230 and 1235 is swapped, and the figure thus aligns with its description on p. 31, lines 14 - 19 (which discusses the swapping of operations in these blocks.)

No new matter is introduced with these corrections, which are supported in the specification and drawings as originally filed.

### REMARKS

Several corrections have been made to the specification. Figures 5G5, 6C2, and 12 have been amended (as discussed above in "Amendments to the Drawings"). Claims 1, 3, 5, 10 - 11, 14 - 15, and 17 - 21 have been amended. Claims 22 - 25 have been added. No new matter has been introduced with these corrections, amendments, or added claims, all of which are supported in the specification and drawings as originally filed. Claims 1 - 25 are now in the application.

I. Rejection under 35 U.S.C. §102(b)

Paragraph 4 of the Office Action dated September 9, 2004 (hereinafter, "the Office Action") states that Claims 1 - 6, 10 - 11, 14 - 15, and 17 - 21 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent 6,037,935 to Bates et al. This rejection is respectfully traversed.

The Bates reference pertains to information that is displayed to a user. See, for example, col. 1, lines 9 - 10 ("for visually indicating the degree of exploration ... on a web page"; col. 1, line 66 ("displays to a user"); etc. Fig. 5 uses a number "128" to indicate where these "degrees of exploration" might be displayed in a sample web page. See col. 5, lines 30 - 33 and col. 6, lines 2 - 3. This is unrelated to Applicants' claimed invention, as will now be described in more detail.

Applicants' independent Claims 1 and 19 - 21 specify limitations of programmatically modifying an input document (e.g., a document from which a web page may be subsequently

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rendered), and in contrast to Bates, do not pertain to creation of user-viewable markings.

Applicants have amended their independent Claims 1 and 19 - 21 herein to more clearly indicate that the limitation "a navigation stop should occur at this element in a determined navigation order" pertains to a subsequent rendering of the element. For example, if Applicants' invention is used with the document 500 of Fig. 5A, the elements at which navigation stops "should occur ... in a determined order", upon subsequent rendering, are the input fields specified at reference numbers 505 and 510, and the "indication" of these navigation stops is found in the values 507 - 508, 512 - 513 of TABINDEX attributes 506, 511.

This sample document 500 specifies content for the top navigation area of a sample portal page, and an example rendering of this navigation area is shown at 710 of Fig. 7. According to the present invention, the order in which the user reaches the two input areas (captioned "Userid" and "Password") of this navigation area 710 is programmatically determined and the underlying element of the input document is programmatically modified to specify this navigation order. Independent Claims 1, 20, and 21 pertain to the input document, and do not include limitations specifying the actual rendering thereof. (Independent Claim 19 specifies limitations pertaining to both the input document and the rendering thereof, and is discussed in more detail below.)

On page 3 of the Office Action, lines 1 - 2 indicate that the Examiner has interpreted "navigable element" as a hyperlink on an HTML page. Applicants respectfully disagree with this interpretation, and refer the Examiner to p. 11, lines 8 - 9 of their specification. As stated therein, a "navigable" field may also be described as a "tab-able" field, or "fields or elements

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which can receive the focus". Furthermore, a hyperlink is not "on" an HTML page, it is "on" a web page that is created according to syntax in an underlying HTML document. Bates' invention pertains to displaying user-viewable information associated with these hyperlinks, and in particular, a "degree" of exploration associated with each hyperlink. This "degree" may also be described as a "depth" of exploration. (See, for example, line 10 of the Abstract and col. 7, lines 19 - 51.) The depth/degree of exploration, as taught by Bates, is unrelated to the order of navigation of rendered elements. Applicants' claim language specifies limitations related to ordering of navigation, not depth or degree of exploration.

Page 3, lines 16 - 17 of the Office Action analyze the third element of Applicants' independent Claim 1, and specify that the Examiner interprets "navigation order" as being equivalent to displaying the number of links. Applicants respectfully disagree. The number of reachable links is not related to the order, or sequencing, of navigating to an element (where this order of navigation is specified in limitations of Applicants' invention). Furthermore, this element of Applicants' independent claims specifies modifications being made to an element of an input document: there is no claim language in Claim 1 specifying a document that is currently viewable (i.e., rendered) to a user. Applicants find no discussion in Bates of programmatically modifying the input document; instead, Bates is concerned with modifying a rendered version of an input document (i.e., a web page created from an input document).

With regard to independent Claim 19, Applicants also respectfully disagree with interpretations of their claim limitations as discussed in paragraph 17 of the Office Action. For

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example, lines 12 - 13 of page 7 specify that Bates' displaying of the degree of exploration "means the displays [sic] the navigation stops on navigable elements". As explained above, the limitations of Applicants' Claim 19 which are discussed on lines 6 - 13 of page 7 of the Office Action do not pertain to a rendered web page; instead, they pertain to input documents (which are not yet viewable, because they have not yet been rendered).

Applicants thus respectfully submit that their independent Claims 1 and 19 - 21 are clearly patentable over Bates.

Applicants also disagree with the Office Action analysis of several of their dependent claims, as will now be discussed. In paragraph 8 of the Office Action, Claim 4 is analyzed. Applicants note that Claim 4 includes limitations pertaining to "an aggregated document" that is created from a plurality of input documents. The citations have no teaching of an aggregated document, and instead pertain to a chain of documents, where the documents in this chain are reachable by traversing hyperlinks. This is irrelevant to Applicants' Claim 4.

Paragraph 11 of the Office Action states, with reference to Claim 10, that a portlet "is another form of a link", and provides a definition of "portlet specification" that is taken from an online dictionary. Applicants have amended this dependent claim to clarify that the input document is "a markup stream created by a portlet". (See, for example, p. 13, lines 7 - 9 of Applicants' specification, which states that a portlet creates markup that is contributed to an aggregated markup stream.) Bates has no teaching of programmatic modifications to markup

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streams created by portlets.

Paragraph 13 of the Office Action analyzes Claim 14. Applicants have clarified this claim to specify that the "region" mentioned therein is a "user interface region". (See, for example, p. 16, line 17 of Applicants' specification, referring to a "region of the portal page".) Applicants note that the analysis in paragraph 13 fails to discuss any concept of regions.

Paragraph 16 of the Office Action analyses Claim 18. This claim includes limitations pertaining to "an offset within the [user interface] region", yet paragraph 16 fails to discuss any concept of offsets within regions.

Applicants also respectfully submit that their dependent Claims 2 - 6, 10 - 11, 14 - 15, and 17 - 18 are patentable over Bates by virtue of the novelty of the independent claims from which they depend. Accordingly, the Examiner is respectfully requested to withdraw the §102 rejection.

### III. Rejection Under 35 U.S.C. §103(a)

Paragraph 20 of the Office Action states that Claims 7 - 9 and 12 - 13 are rejected under 35 U.S.C. §103(a) as being unpatentable over Bates in view of U. S. Patent Application 2002/0032706 to Perla. Paragraph 26 of the Office Action states that Claim 16 is rejected under 35 U.S.C. §103(a) as being unpatentable over Bates in view of U. S. Patent Application 2003/0115167 to Sharif. These rejections are respectfully traversed.

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With regard to Claims 7 - 9 and 12 - 13, Applicants respectfully submit that these claims are patentable over a combination of Bates and Perla (assuming, *arguendo*, that such combination can be made and would be suggested to one of skill in the art) by virtue of the allowability of the independent claims from which they depend.

With regard to Claim 16, Applicants respectfully submit that Sharif's discussion of the TABINDEX attribute is distinct from their claimed invention. The cited paragraph 110 of Sharif refers, in a first usage, to prior art functioning of TABINDEX, and for a second usage, states that page elements reachable from a current page element are selected for association with direction keys. For example, if a current page element has a TABINDEX value of "2", Sharif teaches that direction keys should be associated with the page elements having TABINDEX values of "1" and "3". (See the sentence beginning "If the currently-selected page element ...", where this is discussed.) There is no teaching in the cited references of programmatic modifications such as those specified in Applicants' independent Claim 1, from which Claim 16 depends.

Applicants therefore respectfully submit that their dependent Claims 7 - 9, 12 - 13, and 16 are patentable over the references, and the Examiner is respectfully requested to withdraw the §103 rejection.

#### IV. Conclusion

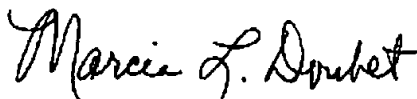
Applicants respectfully request reconsideration of the pending rejected claims, withdrawal of all presently outstanding rejections, and allowance of all claims at an early date.

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Respectfully submitted,



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Attachment: Replacement Sheets (3)

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